

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

TRAVELODGE HOTELS, INC.,)	CASE NO. 1:01-CV-00784
)	
Plaintiff,)	JUDGE WEBER
)	MAGISTRATE JUDGE TIMOTHY S. BLACK
v.)	
)	
GOPAL GOVAN,)	
)	<u>AFFIDAVIT OF STEVEN A. GOLDFARB</u>
Defendant/Third-Party)	
Plaintiff,)	
v.)	
)	
CINCINNATI TRAVELODGE,)	
)	
Third-Party Defendant.)	
STATE OF OHIO)	
)	SS.
COUNTY OF CUYAHOGA)	

Steven A. Goldfarb, being first duly sworn, deposes and says as follows:

1. I am a partner with the law firm of Hahn Loeser & Parks LLP ("Hahn Loeser") and have personal knowledge of all matters stated herein.


2. I was responsible for managing the representation of Plaintiff Travelodge Hotels Inc. ("THI") in connection with the appeal of this matter to the United States Court of Appeals for the Sixth Circuit (hereinafter referenced as the "Appeal"). I submit this Affidavit as evidence of the attorneys' fees and costs which have been incurred by THI in connection with the Appeal.

3. THI seeks to supplement the Court's award of attorneys' fees and costs as set forth in its Order dated January 8, 2004 (ECF #65) in the amount of \$54,290.00 for

legal fees (\$52,164.00) and costs (\$2,126.00) relating to the Appeal. The Invoices attached hereto as Exhibits 1 - 12 set forth in detail the costs incurred and the hours spent by attorneys of Hahn Loeser in connection with the Appeal.


4. I have reviewed the attached Invoices and I believe that the hourly rates reflected in the attached Invoices are reasonable for the individual attorney and time spent, based upon my years of experience and my knowledge of litigation. In addition, I am generally familiar with the hourly rates charged by other attorneys in the community and believe that Hahn Loeser's rates charged in this matter are at or below the average market rates for attorneys with similar experience in Cleveland and Cincinnati, Ohio. Finally, I believe that the fees and costs reflected in the Invoices were reasonable and necessary for the successful defense of the Appeal.

FURTHER AFFIANT SAYETH NAUGHT.



Steven A. Goldfarb

SWORN TO BEFORE ME and subscribed in my presence this 21st day of
December, 2005.



Notary Public

PATRICIA A. BAMBAM, Notary Public
State of Ohio
My commission expires Nov. 26, 2010